

**U.S. Department of Justice**

United States Attorney  
Southern District of New York

86 Chambers Street, 3rd Floor  
New York, New York 10007

June 3, 2008

**MEMO ENJOINED**

**BY FAX: 914.390.4085**

The Honorable Charles L. Briant  
United States District Judge  
United States Courthouse  
300 Quarropas Street, Room 275  
White Plains, New York 10601

Re: *Duncan v. Sound Shore Medical Center*, 07 Civ. 3094 (CLB)

Dear Judge Briant:

On behalf of all parties, I write to respectfully request that the Court extend the deadline for completing discovery for a period of two months – from June 18 to August 18, 2008. The parties have completed written discovery and depositions of parties, and are currently conducting depositions of non-party witnesses. In addition, plaintiff – who currently resides in Florida – is scheduled to meet with the Government's vocational and rehabilitation expert on June 18. During the next two months, the parties propose to undertake mediation and complete expert discovery. The Court has already referred the case for mediation.

In order to facilitate the orderly completion of expert discovery, and to allow adequate time to engage in mediation, the parties request that the Court modify the discovery schedule in this case to include the following deadlines:

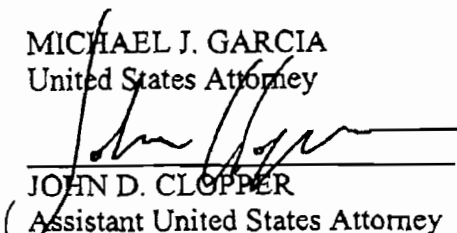
1. June 11 – Last day for plaintiff to serve expert reports;
2. July 4 – Last day for defendants to serve expert reports;
3. July 25 – Last day to depose plaintiff's experts;
4. August 18 – Last day to depose defendants' experts.

Thank you for your consideration of this request.

Respectfully,

MICHAEL J. GARCIA  
United States Attorney

By:

  
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